

Sea Horse Container Lines, Inc.

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September 9, 2003

Honorable Bryant L. Van Brakle
Secretary
Federal Maritime Commission
800 North Capitol St. N. W.
Washington, D.C.

RE: Petition of National Customs Brokers and Forwarders Association of
America, Inc. for a Limited Exemption From Certain Tariff Requirements
Of the Shipping Act of 1984

Dear Secretary Van Brakle:

I am the President of Sea Horse Container Lines, Inc., an NVOCC with seventeen offices in the United States and agents at all principal ports, world wide. We operate under License No. 17130N issued by the Federal Maritime Commission with effect from May 1, 1999.

In order to comply with tariff requirements we employ the services of a tariff-publishing firm. Our annual subscription cost, in excess of \$7,000.00, does not include our staff time or expense to maintain the tariff. We estimate 16 man-hours per month and an in-house cost of approximately \$500 monthly are expended to properly maintain the tariff. These costs are fully absorbed and are not passed on to persons seeking access to our tariff.

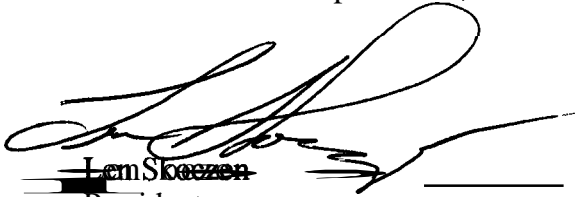
We are not able to track the number of times shippers or other persons access our tariff, although, I understand our tariff publishing service can provide us with those details for additional cost.

We estimate that the percentage of our company's cost that are either directly or indirectly related to rate tariff compliance is about 9%. This is most discouraging since approximately 90% of the time rates are separately negotiated with shippers and, our existing tariff rates are oftentimes not applicable.

In summary, we believe the requirement to file and maintain rate tariffs has outlived its' usefulness. The existing regulation is no longer practical and serves no beneficial purpose either to NVO's or shippers. The great majority of shippers don't access or rely on NVOCC rate tariffs but instead, negotiate each rate separately. The regulation does not afford us the flexibility necessary to properly deal with our customers because we as NVO's negotiate each rate with the steamship lines. We further believe that the reduction of cost that would result from the elimination of the tariff-filing requirement would, in many cases, be passed on to the shippers.

I Len Skoczen declare that to the best of my knowledge, and under penalty of perjury, the foregoing is true and correct. I further **certify** that I am qualified and authorized to file this verified statement.

Executed on September 9, 2003.



~~Len Skoczen~~
President